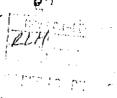
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ORANGE COUNTY WATER DISTRICT.

December 14, 1995

Mr. Bob Holub Santa Ana Regional Water Quality Control Board 2010 Iowa Avenue, Suite 100 Riverside, CA 92507-2409

RE: Request for Closure by American Electronics, Inc., Fullerton, California

Dear Bob:

Orange County Water District (OCWD) staff has reviewed available information regarding the above referenced site and has the following comments:

- 1. The groundwater monitoring review section of the report entitled Quarterly Vapor Extraction System Progress Report and Fourth Round of Semiannual Groundwater Monitoring for the American Electronics, Inc. Facility Located in Fullerton, California dated March 23, 1995 fails to recognize the significance of well BP-4 as the well most directly upgradient from the chemical storage areas at the southwest corner of the site. This well is more appropriate for chemical concentration comparison than wells BP-2 and BP-3. Concentrations of TCE in well BP-4 have been consistently lower than in wells BP-2 and BP-3.
- TCE concentrations have been consistently higher in downgradient well BP-1 and BP-8
 than in well BP-4. In fact, TCE concentrations in BP-1 and BP-8 are more than ten times
 greater than the MCL (February 1995 sampling event).
- 3. We believe that available soil and water quality data collected at the site clearly demonstrate that the past operations of American Electronics have caused groundwater VOC contamination. This is acknowledged by American Electronics in its report entitled Phase II Subsurface Investigation for the American Electronics Inc. Facility Located at 1600 East Valencia Drive in the City of Fullerton. California, August 30, 1991 where it states that "groundwater beneath the site has been impacted with VOCs, primarily PCE and TCE".

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In summary, we believe that TCE in wells BP-1 and BP-8 remains at levels that threaten basin drinking water supplies. Based on this, we recommend that the Santa Ana RWQCB provide American Electronics, Inc. an option to either continue with the current semiannual groundwater monitoring program while OCWD evaluates the feasibility of a regional groundwater cleanup program or begin remediation of the groundwater beneath the site to VOC levels at least consistent with those in upgradient well BP-4.

If you have any further comments please call me at (714) 378-3245.

Sincerely,

Marina D. West Hydrogeologist

Mr. Mark Cousineau - Cousineau, Lundblad & Assoc, Inc.

Mr. William Weaver - Applied Geosciences, Inc.